

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERIN BRAVER, an individual,

Plaintiff,

vs.

HCSLV, INC. a Domestic Corporation;
ORTHOPAEDIC INSTITUTE OF
HENDERSON, a Domestic Corporation;

Defendants.

CASE NO: 2:21-cv-01959-JCM-NJK

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**
(First Request)

Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., on behalf of Plaintiff ERIN BRAVER ("Plaintiff"), and David A. Stephens, Esq., of the law firm of Stephens Law Offices, on behalf of Defendants HCSLV, INC. and ORTHOPAEDIC INSTITUTE OF HENDERSON (hereinafter "Defendants"), and do hereby stipulate and agree to extend the discovery deadlines set forth in the Joint Stipulated Discovery Plan and Scheduling Order (ECF #11) forty-five (45) days to July 7, 2022, pursuant to LR IA 6-1, LR 7-1, and LR 26-3 for the reasons provided below. This is the parties' first request for an extension of discovery deadlines.

Discovery closes on May 23, 2022. The last day to file Dispositive Motions is June 22, 2022.

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1 **1. DISCOVERY COMPLETED TO DATE:**

2 A. Plaintiff served Initial Disclosures on Defendants on February 4, 2022.

3 B. Defendants served Initial Disclosures on Plaintiff on December 30, 2021.

4 C. Defendant served discovery on Plaintiff in the form of Interrogatories on February 2,
5 2022 and Requests for Production of Documents on April 12, 2022. Plaintiff provided its responses
6 to the Interrogatories on March 17, 2022 per requested extension and the Requests for Production
7 on May 3, 2022.

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9 D. Plaintiff served discovery in the form of Interrogatories, Requests for Admissions
10 and Requests for Production of Documents on Defendants on April 19, 2022. Defendants'
11 responses are due on May 30, 2022 per stipulated extension.

12 **2. DISCOVERY YET TO BE COMPLETED:**

13 A. Plaintiff intends to depose Defendants' witnesses Mark Cole and Dr. Steven Hoer on
14 June 24, 2022.

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16 **3. REASONS DISCOVERY COULD NOT BE COMPLETED WITHIN THE**
17 **EXISTING DEADLINE.**

18 Good cause exists for this extension. The scheduling of the depositions of Defendants'
19 witnesses while discovery has been open has been difficult due to conflicts with counsels'
20 schedules. One of the parties to be deposed is currently in the hospital recovering from surgery.
21 The other is a busy physician. The parties have been diligent in conducting discovery. In order to
22 allow for the parties to complete the remaining discovery provided above, the parties respectfully
23 request that the discovery deadlines in this matter be extended forty-five (45) days for the purpose
24 of taking these two depositions of these witnesses on June 24, 2022, or some other mutually-
25 agreeable date and time should that date become inconvenient. This is the first request for an
26 extension, which is made in good faith and not for the purposes of delay.

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4. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY AND OTHER DISCOVERY DEADLINES.

In summary, the close of discovery shall be continued from May 23, 2022 to July 7, 2022, for the purposes as set forth herein, above; the dispositive motion deadline shall be continued from June 22, 2022 to August 8, 2022.

IT IS SO STIPULATED:

Dated this 23rd day of May, 2022.

Dated this 23rd day of May, 2022

HATFIELD & ASSOCIATES, LTD.

STEPHENS LAW OFFICES

/s/ Trevor J. Hatfield

/s/ *David A. Stephens*

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**NO FURTHER EXTENSIONS
WILL BE GRANTED.**

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: May 24, 2022